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PERMIT EVALUATION
AND
DECISION DOCUMENT

Reference ID No: 95-00986
(Columbia Slough - Wetland Fill)

Concerning issuance of Department of the Army permit:

APPLICABLE STATUTORY AUTHORITY OR AUTHORITIES:

Section 404, Clean Water Act (86 Stat. 816, P.L. 92-500), for discharge of dredged or fill material into waters of the United States.

APPLICANT: Port of Portland

LOCATION: Adjacent to N. Lombard Street (Section 35, T2N, R1W), Columbia Slough (mile 2.3), in Portland, Multnomah County, Oregon.

WORK: To place approximately 9530 cubic yards of clean fill material into 1.27 acres of wetlands. Side slopes of the fill will be at 2.75H:1V. A 25 foot clear span trestle will be placed at the east end of the project site to provide passage for wildlife. A sediment fence will be used to identify the access boundary and prevent encroachment into adjacent wetland areas. All staging will occur on adjacent uplands. Any areas disturbed by construction that are not within the footprint of the fill will be restored to their present condition.

MITIGATION: Impacted wetland resources will be replaced by restoring wetlands west of the impact site within the same drainage corridor. Fill material will be removed adjacent to an existing pond/wetland area to restore wetland hydrology to an area of 1.3 acres; the surrounding upland habitat will be enhanced. The proposed mitigation will be an extension of wetland mitigation presently being constructed by the Port for wetland impacts at the Terminal 5 development site (authorized by Permit 95-534).

PURPOSE: Expand rail capacity and provide more efficient rail service to industries in South Rivergate.

NEED: The current rail facilities are at capacity, while the needs of existing industries for rail service are growing. Over 150,000 rail cars per year, serving Terminal 4, Columbia Grain, Oregon Steel Mills and others, enter the industrial area through a single Union Pacific (UP) track. Businesses currently served by the rail have experienced substantial delays in service. The proposed project will divert 30,000 rail cars per year, currently routed via the UP track through nearby neighborhoods. These cars would instead enter the industrial area using Burlington Northern (BN) track along N. Marine Drive. The project will also create a seamless interchange between BN and UP tracks, creating more access options for businesses in Rivergate. As a result, industry will not have to rely on a single access point, which may be blocked or damaged due to volume, derailment or other impediments.

ENVIRONMENTAL ASSESSMENT (EA)

Background. The entire rail expansion project covers 2.5 miles. About 1.5 miles passes within 200 feet of the Smith and Bybee Lakes Management area. The remainder of the proposed rail alignment is surrounded by industrial land both developed and undeveloped. Most of the rail line will be constructed on unvegetated upland areas.

Two portions of the alignment fall within regulatory jurisdiction: the proposed wetland fill being considered under this application, and the bridged crossing of Columbia Slough at mile 0.8. Columbia Slough is considered to be

a navigable waterway for regulatory purposes to mile 8.4. Because of the slough's navigable status, the construction of the bridge falls under the jurisdiction of the U.S. Coast Guard; a permit from the Corps of Engineers under Section 10 of the Rivers and Harbors Act is not required. The Coast Guard requires a permit based on the slough's susceptibility to "use in its natural condition or by reasonable improvement as a means to transport interstate or foreign commerce." (Letter from Bruce Johnson, Division Bridge Engineer, US Coast Guard to Alan Lively, Oregon Department of Transportation; dated October 30, 1995). A permit is required under Section 404 of the Clean Water Act for bridge related fills; this was covered by Nationwide Permit 15 (permit no. 95-983). NW15 authorizes discharges of "dredged or fill material incidental to the construction of bridges across navigable waters of the United States, including cofferdams, abutments, foundation seals, piers, and temporary construction and access fills provided such discharges have been authorized by the U.S. Coast Guard as part of the bridge permit." (33 CFR 330, Appendix A, Section B, 15).

Corps regulations at 33 CFR Part 325, Appendix B describes the NEPA (National Environmental Policy Act) implementation procedures for the regulatory program, including the appropriate "scope of analysis". These regulations state that ". . . regulated activities that comprise merely a link in a transportation or utility transmission project, the scope of analysis should address the Federal action, i.e., the specific activity requiring a DA (Department of the Army) permit and other portion of the project that is within the control or responsibility of the Corps of Engineers (or other Federal agencies)." Therefore, the scope of analysis for this Environmental Assessment will include both the bridge crossing and wetland fill. Neither the origin and destination of the rail line nor its route to and from the bridge crossing and wetland fill are within the control or responsibility of the Corps of Engineers.

I. Alternatives (33 CFR 320.4(a)(2), 40 CFR 230.10)

The following alternatives to the proposed project were evaluated.

A. No action: This alternative would not accomplish the primary project objectives. Delays in rail service would continue with the no build alternative as the needs of existing industries grow. Also, industries may experience a lengthy interruption in service if the existing single track were to become blocked or damaged as a result of derailment. Providing a second access into the Rivergate area would allow service to continue if such a blockage occurred.

B. Other project designs:

Alternative 1. This alternative would cross the Columbia Slough at the same location as the proposed project and turn west into south Rivergate prior to the proposed wetland crossing. This alternative would fill no wetlands, but would cross North Lombard at a very oblique angle near the its intersection with Rivergate Boulevard. This would be an unacceptable safety risk which would not likely be approved by the Public Utility Commission (PUC) or the City of Portland.

The Port does not own all of the property within this alternative alignment; to carry out this alternative, buildings and businesses within the right of way would have to be condemned. The cost for this alignment would be greater than for the proposed alternative and would include the cost of condemning or relocating businesses, and upgrading the intersection of the rail line at N. Lombard and Rivergate Boulevard.

Alternative 2. This alternative would extend the track along North Marine Drive adjacent to Terminal 6 and cross Columbia Slough near mile 0.2. This

alternative would involve no wetland filling, but is not practicable for several reasons. With this alternative, trains of various lengths would block Terminal 6 (T-6) upon entering South Rivergate. T-6 currently averages 700 trucks per day; 1200 to 1400 expected at full operational capacity. Blockage would occur several times per day resulting in increased air emission as trucks idle to wait for trains to pass. Such blockage would also cause congestion on North Marine Drive.

This alternative would not achieve one of the goals of the project which is efficient interchange between the UP and BN tracks. It would provide no service to most properties in Rivergate which is one of the benefits of the proposed alternative. In addition, this alternative is not consistent with certain unit train requirements for the degree of curvature and operational feasibility from T-6 South into the south Rivergate yard.

Design Alternatives within the Proposed Project. In order to minimize the wetland fill under the proposed project, side slopes were reduced from the standard 3H:1V to 2.75H:1V. Slopes cannot be steepened further and still be structurally sound. The Port evaluated the use of a 48-inch culvert at the southwest fill area, but rejected this for the 25-foot trestle to provide greater passage for wildlife.

II. Existing Physical/Chemical Characteristics and Anticipated Changes

A. Substrate. Within the area of the wetland fill, placement of fill material for the rail line will cover the existing substrate. Construction activities may result in the disturbance of some areas outside of the footprint of the rail line fill; however, these areas will be restored following completion of the project. Bridge footings will likewise cover the slough bottom as will any bridge related fills. Material is not expected to slough from the embankment; erosion is not anticipated as a result of water flows around the bridge abutments.

B. Suspended particulates; turbidity; water quality. A sediment fence will be placed in the area of the wetland crossing to identify construction access boundaries and prevent encroachment into the wetland.

At the bridge crossing of Columbia Slough, sheet pile coffer dams will be used to isolate work areas and minimize turbidity increases. Concrete will be allowed to cure prior to removal of the coffer dams to prevent contamination of the slough. The Department of Environmental Quality has issued a NPDES permit to the Port; an erosion control plan will be developed by the Port to comply with the requirements of this permit for construction activities. Runoff from the construction site should not result in significant increases in suspended particulates and turbidity.

A stormwater plan has been developed for the Rivergate area including two wetland treatment systems designed to prevent significant impacts to water quality to Columbia Slough. During construction activities, the construction company will be required to have a spill prevention plan; a similar plan will be required of Burlington Northern Railroad for the operation of the rail line.

C. Floodplain functions. As part of the land use review for this project, the City of Portland ~~will~~ has considered impacts to floodplain functions, and approved the project.

D. Minimal Impacts. The project is expected to have no more than minimal impacts on the following: Storm, wave and erosion buffers; Erosion and accretion patterns; Aquifer recharge; Baseflow; Currents, circulation or drainage patterns.

July - these are approximate, but we must as well make them add up

III. Existing Biological Characteristics and Anticipated Changes

Additional information regarding the existing environment and potential impacts from the rail bridge and wetland fill can be found in the document "Rivergate Rail System and Columbia Slough Intermodal Expansion Bridge, Review of Environmental Issues", Prepared by Fishman Environmental Services for the Port of Portland, dated March 1992 (Attachment _).

A. Special aquatic sites. The proposed project will result in the loss of 1.27 acres of wetland: about 1 acre shrub-scrub, 0.1 acre emergent, and 0.1 acre open water. Mitigation has been proposed which will restore wetland hydrology to 1.3 acres; surrounding upland will be enhanced over an area of 1.1 acres to shrub/scrub habitat. Existing fill material will be excavated to elevations appropriate for the establishment of emergent and shrub wetlands. Mitigation for this project is an extension of the mitigation provided for wetland fills associated with the development at Terminal 5 (Permit No. 95-534). Values of fill site - vegetation ? Do you need more info than I provided in my letter?

The western portion of the mitigation site presently consists of sand/rock fill with upland vegetation; the eastern portion has a central wetland area surrounded by uplands. The existing wetland on the mitigation site is a shallow pond containing submersed macrophytic vegetation bordered by a band of purple loosestrife and willow. A high terrace of fill material along the south side of the pond transitions to an upland cottonwood forest. Forested areas are not a part of the mitigation plan and will not be disturbed during construction.

Wetland mitigation goals are: 1) restore wetland hydrology and 2) establish emergent wetland and scrub/shrub habitat using native Pacific northwest plant species. A program to control weedy and invasive species will be undertaken at this site. Wetland functions targeted for this mitigation project are to establish high-value wildlife habitat and enhance the corridor between the Willamette river and Columbia Slough. Vegetation to be included within the restored emergent wetland include short-awned foxtail, carex, tufted hairgrass, soft rush, and small-fruited bullrush.

No wetlands are present at the site of the bridge crossing.

B. Habitat for fish and other aquatic organisms. The Willamette River and lower Columbia Slough provides habitat for both resident and anadromous fish. The proposed wetland fill will not have an adverse impact on fish or their habitat, but aquatic organisms within the footprint of the rail line will be eliminated. At Columbia Slough, work for the bridge crossing will generally be done within the preferred inwater work period of July 1 through October 31 and December 1 through January 31. Any work which may need to be done outside of this work period would be done within coffer dams to prevent excessive turbidity which could affect fish and other aquatic organisms.

C. Wildlife habitat (breeding, cover, food, travel, general). A variety of birds, mammals, and herptiles are present in the area of both the bridge crossing and wetland fill. The wetland fill section has been designed with a 25-foot trestle to allow wildlife passage under the rail line. The slough bridge has been designed to allow a bike path underneath, which could also allow wildlife passage along the banks of the slough. Some areas along the slough which are now unvegetated will be planted with native trees and shrubs to improve cover and food sources.

many types of wildlife can cross the tracks.

Construction of the path is anticipated by

D. Endangered or threatened species. No threatened or endangered species have been identified as occurring within the project area.

Mitigation site is zoned and will have a deed restriction to promote long term use of the site for wildlife + open space.

E. Biological availability of possible contaminants. The proposed project is not expected to directly introduce contaminants into the environment. Burlington Northern Railroad will be required to develop a spill plan as part of the operation of the rail line.

IV. **Existing Human Use Characteristics and Impacts**

A. Cultural values (section 301(5) National Historic Preservation Act). An investigation of potential cultural resources at the slough crossing and wetland fill site was done by Archaeological Investigations Northwest, Inc. One site was found on the bank of Columbia Slough; a management plan to identify the extent of the site was prepared by AINW. The State Historic Preservation Officer has concurred with the Corps of Engineers determination of "no effect through data recovery" by letter dated February 12, 1996.

B. Traffic and Transportation. The project's purpose is to improve rail and vehicular traffic patterns, and cause fewer rail delays. The Macrum Crossing has caused numerous traffic delays, and fines have been levied against the railroad for blocking vehicular traffic for long periods of time.

C. Safety; Air quality; Noise. Fewer intersections will be crossed by the proposed alignment resulting in some improvements to vehicle and rail safety.

Information provided by the applicant indicates that the rail expansion project will reduce carbon monoxide emissions by 42 percent and hydrocarbon emissions by 46 percent. If a higher proportion of services are performed by rail as opposed to truck, reductions would be greater. This information is based on air quality modeling conducted by CH2M Hill specifically for the rail expansion project (Attachment _). More efficient rail and vehicular traffic will also reduce fuel consumption as engine idle time is reduced.

Expansion of rail service into presently undeveloped areas of the Rivergate Industrial District will result in increased noise levels. Development of this area, even without the rail project, would also result in greater noise levels than presently exist. Where the tracks pass closest to the Smith and Bybee Lakes Management area, vegetation planted along the slough will lessen the levels of noise heard from this area.

D. Navigation. Columbia Slough is considered to be a navigable waterway for both Corps of Engineers and Coast Guard regulatory purposes. A Federal navigation channel 7.7 miles in length was authorized in May of 1950 and extended from the mouth of the slough to Union Avenue. This project was classified as inactive in 1969 and deauthorized in 1978. Commercial navigation does not occur, but recreational use is common. The rail bridge crossing will have the same vertical clearance as the downstream highway bridge; recreational navigation of the slough will, therefore, not be affected. (and horizontal

E. Land use classification. The Rivergate District is zoned industrial; this zoning will not change as a result of the rail expansion project.

F. Minimal Impact Categories. The proposed project is expected to have no more than minimal impacts on the following: Existing and potential water supplies; water conservation; Recreational or commercial fisheries; other water related recreation; Aesthetics; Parks, national and historic monuments, national seashores, wild and scenic rivers, wilderness areas, research sites, etc.; Economics; Prime and unique farmland (7 CFR Part 658); Food and fiber production; General water quality; Mineral needs; Consideration of private property; and the Needs and welfare of the people.

V. **Summary of Secondary and Cumulative Effects:** Several permits have been issued to the Port of Portland for projects within the Rivergate area. These permits authorized improvements to the existing dock at Terminal 5, Berth 503 (permit no. 95-753), construction of the rail bridge across the slough (permit no. 95-983), and construction of a new storm water outfall pipe (permit no. 95-1139). These actions, individually or cumulatively, are not expected to have more than minimal impacts to the environment.
A larger project, with respect to wetland filling, was issued to the Port in September 1995 for the development of Terminal 5 as a bulk commodities facility. This permit authorized the filling of about 12.5 acres of wetlands found to be under Corps of Engineers jurisdiction; the Oregon Division of State Lands claimed jurisdiction for only 9.4 acres of wetlands. The mitigation proposed by the Port for the T-5 project was 10.7 acres of restoration. Under the mitigation guidelines, restoration ratio is 1 acre restored for every acre impacted. The proposed mitigation satisfied the DSL requirements, but fell short as far as Corps jurisdiction was concerned. The Port, therefore, completed a HEP (Habitat Evaluation Procedure) at the T-5 mitigation site which concluded that the mitigation as proposed would adequately replace the functions and values lost as a result of the wetland filling.

let's talk

In the end, you evaluated additional info and agreed mitigation was adequate

The rail project combined with the authorized T-5 project will result in the loss of 13.8 acres of wetlands. Mitigation for both projects are adjacent to one another (totaling 12 acres of wetland restoration plus additional upland enhancement) and have been designed with similar objectives. Monitoring will occur for a period of five years at both mitigation sites. At the end of that period, the Port will be relieved of monitoring duties only if the sites meet the stated goals and are functioning as wetlands. The T-5 mitigation site will require the completion of another HEP analysis to determine if functions and values lost at the fill site have adequately been replaced.

FINDINGS

I. A 30-day public notice describing the project was issued on November 13, 1995, and sent to all interested parties including appropriate state and Federal agencies. All comments received on this action have been reviewed, and they are summarized and addressed below.

A. Summary of comments received.

1. Federal agencies: Region X of the Environmental Protection Agency, the National Marine Fisheries Service, and the U.S. Fish and Wildlife Service did not respond to the public notice.

2. State and Local Agencies.

a. Oregon Division of State Lands (ODSL), speaking for all state agencies including the Oregon Department of Fish and Wildlife, approves the project subject to the conditions outlined in FP-10282.

b. The Oregon Department of Environmental Quality certified by letter dated January 11, 1996, that there was reasonable assurance the project would not violate applicable water quality standards. No special conditions were attached to this certification.

3. Organizations. Responses were received from the following:

a. The Pacific Northwest Waterways Association commented by letter dated November 20, 1995, in support of the proposed project.

b. Northwest Environmental Advocates expressed the following comments by fax dated December 13, 1995:

1) The mitigation site proposed for this wetland fill appears to be identical as the site used for the Terminal 5 wetland fill project. This is double dipping and is prohibited.

2) The trestle/train activity will impact the wildlife corridor that connects Smith and Bybee Lakes and the Willamette.

3) Applicants are required to vegetate the buffers at the existing mitigation site mentioned in this fill application. They are in non-compliance.

4) This proposed fill and the Terminal 5 fill are connected actions with connected impacts that should be assessed together along with all other past, present or future foreseeable mitigation fills associated with the wildlife corridor.

RESPONSE: 1) The mitigation site compensating for wetland impacts from this project is adjacent to the T-5 mitigation site.

2) Some disruption to wildlife passage will occur in that there will not be the wide open space that now exists. Wildlife will still be able to pass beneath the tracks by means of the trestle and will likely pass over them as well.

3) It is assumed that the NEA is referring to the mitigation for the T-5 site. The permit issued for that project did not require vegetated buffers; no violation of permit conditions has occurred.

4) Other recent actions occurring within the Rivergate District is provided in the Cumulative and Secondary Effects section.

c. The Union Pacific Railroad, listed as an adjoining property owner, did not respond to the public notice.

4. Individuals. William Michael Jones requested by letter dated February 5, 1996, that the permit be denied. Concerns are as follows:

1) The project scope is not complete; the rail project is much greater than the segment identified in the public notice.

2) The Port of Portland has been involved in illegal filling and piecemealing in the Rivergate area. No further permits should be issued until and Environmental Impact Statement is prepared for the entire area.

3) Mitigation is overstated and not sufficient. The applicant has a history of not completing mitigation.

4) The need for the project and alternatives to the project have not been considered.

RESPONSE: 1) The scope of analysis is discussed in the background section of the Environmental Assessment. In a letter dated March 1, 1996, the applicant indicated that this project will provide a rail connection between two industrial areas with existing rail yards and other infrastructure. A chronology of planning and development for both the rail bridge and Terminal 5 upgrade was provided (Attachment _) to show that these projects were developed independently of one another. A cultural resources investigation was conducted for this project as discussed in Section IV of this document.

2)

3)

4) The alternatives evaluated, including those with no wetland impacts, are discussed in Section I of the Environmental Assessment. The Port has indicated that complaints have been received associated with the existing rail infrastructure and that fines have been levied against the rail roads for blocking traffic at the Macrum crossing.

B. Evaluation.

1. I have reviewed and evaluated, in light of the overall public interest, the documents and factors concerning this permit application as well as the stated views of other interested agencies and the concerned public. In doing so, I have considered the possible consequences of this proposed work and/or activity in accordance with regulations published in 33 CFR Part 320 and 330 and 40 CFR Part 230.

2. Evaluation of Compliance with 404(b)(1) guidelines (restrictions on discharge, 40 CFR 230.10).

a. Alternatives test.

(1) Based on the discussion in Section I of the EA there are not available, practicable alternatives having less adverse impact on the aquatic ecosystem and without other significant adverse environmental consequences that do not involve discharges into "waters of the United States" or at other locations within these waters.

(2) Based on Section I of the EA if the project is in a special aquatic site and is not water-dependent, the applicant clearly demonstrated that there are not practicable alternative sites available.

b. Special restrictions.

(1) The discharge: Will not violate state water quality standards; will not violate toxic effluent standards (under Section 307 of the Act); will not jeopardize endangered or threatened species or their critical habitat; will not violate standards set by the Department of Commerce to protect marine sanctuaries.

(2) The fill material is not expected to result in the introduction of contaminants into the environment.

c. Other restrictions. The discharge will not contribute to significant degradation of "waters of the United States" through adverse impacts to: human health or welfare, through pollution of municipal water supplies, fish, shellfish, wildlife, and special aquatic life sites; life stages of aquatic life and other wildlife; diversity, productivity and stability of the aquatic ecosystem, such as loss of fish or wildlife habitat, or loss of the capacity of wetlands to assimilate nutrients, purify water or reduce wave energy; recreational, aesthetic and economic values.

d. Actions were taken to minimize potential adverse impacts (mitigation). The following appropriate and practicable steps (40 CFR 230.70-77) will be taken to minimize the potential adverse impacts of the aquatic ecosystem.

1) Mitigation will involve the restoration of 1.3 acres of emergent wetland. In addition, 1.1 acres of upland area will be enhanced to scrub/shrub habitat.
2) Inwater work for the rail crossing of the slough will be done within the preferred work periods specified by the Oregon Department of Fish and Wildlife. Any work done outside of this period will occur behind coffer dams to minimize impacts to aquatic organisms from excessive turbidity.

C. Determinations.

1. 404(b)(1) Compliance Review (40 CFR 230.12). The proposed disposal site for discharge of dredged or fill material complies with the

Section 404(b)(1) guidelines with inclusion of conditions contained in the State and Federal permits.

2. Finding of No Significant Impact (FONSI) (33 CFR Part 230.10). The significance of the work and its environmental effects described above have been evaluated in accordance with 33 CFR 230 and 320-330. The proposed work and/or activity will not significantly affect the quality of the human environment. Therefore, an Environmental Impact Statement has not been prepared.

3. Public Interest determination. I find that issuance of the Department of Army permit, as described in the final permit format with special conditions as established as of this date, is based on thorough analysis and evaluation of the various factors affecting the public interest; that there are no reasonable alternatives available to the applicant that will achieve the purposes for which the work is being constructed; that the proposed work is not contrary to the public interest as reflected in the comments of Federal, State and local agencies and the general public; that the proposed work is deemed to comply with established State and local laws, regulations and codes; that the issuance of this permit is consonant with national policy, statutes, and administrative directives; and that on balance the activity is not contrary to the public interest, and a Department of Army permit should be issued for the described work.

_____ _____

Date Project Manager

_____ _____

Date Reviewer

JOINT
PERMIT APPLICATION FORM

THIS APPLICATION WILL MEET THE REQUIREMENTS OF BOTH AGENCIES

US Army Corps of Engineers
Portland District

AGENCIES WILL ASSIGN NUMBERS

Corps Action ID Number _____ Oregon Division of State Lands Number _____

SEND ONE SIGNED COPY OF YOUR APPLICATION TO EACH AGENCY

District Engineer
ATTN: CENPP-PE-RP
P O Box 2946
Portland, OR 97208-2946
503/326-7730

State of Oregon
Division of State Lands
775 Summer Street NE
Salem OR 97310
503/378-3805

① Applicant Name and Address	Port of Portland P.O. Box 3529 Portland, OR 97208	business phone # 731-7323 home phone # FAX # 731-7626
O Co-Applicant O Authorized Agent O Contractor Name and Address	Dana Siegfried	business phone # 731-7323 home phone # FAX # 731-7626
Property Owner (if different than applicant) Name and Address		business phone # home phone # FAX #

② PROJECT LOCATION

Street, Road or other descriptive location		Legal Description			
		Quarter	Section	Township	Range
N. Lombard Blvd.			35	2N	1W
In or Near (City or Town)	County	Tax Map #		Tax Lot #	
Portland	Multnomah	Block 24		1	
Waterway	River Mile	Latitude		Longitude	
Wetland		45° 37' 01"N		122° 46' 10" W	

Is consent to enter property granted to the Corps and the Division of State Lands? O Yes O No

③ PROPOSED PROJECT INFORMATION

Activity Type: (X) Fill O Excavation (removal) O In-Water Structure O Maintain/Repair an Existing Structure

Brief Description: Railroad crossing

Fill will involve _____ cubic yards annually and/or 9534 cubic yards for the total project

_____ cubic yards in a wetland or below the ordinary high water or high tide line

Fill will be O Riprap O Rock O Gravel (X) Sand (X) Silt O Clay O Organics O Other

Fill Impact Area is 1.27 Acres: 2400 length: varies width: _____ depth

Removal will involve _____ cubic yards annually and/or _____ cubic yards for the total project

_____ cubic yards below the ordinary high water or high tide line

Removal will be O Riprap O Rock O Gravel O Sand O Silt O Clay O Organics O Other _____

Removal Impact Area is _____ Acres: _____ length: _____ width: _____ depth

Estimated Start Date April 1996 Estimated Completion Date December 1996

Will any material, construction debris, runoff, etc. enter a wetland or waterway? O Yes (X) No

If yes, describe the type of discharge and show the discharge location on the site plan.